

Sealed

Public and unofficial staff access
to this instrument are
prohibited by court order.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

VS.

FNU LNU

a/k/a El Gordo;

a/k/a Mario Antonio Chavez-Melendez

a/k/a Hugo Alexander Melendez-Gonzalez

a/k/a Jose Antonio Melendez

JOSE WILLIAM QUINTANILLA

a/k/a Pablo; a/k/a Ronko

FRANCISCO GUERRA YVINNI PLEITEZ

a/k/a Colochin; a/k/a Flaco

ADELIO DE JESUS BATRES

a/k/a Muneco

[illegible]

14-497

CRIMINAL NO.

United States Courts
Southern District of Texas
FILED

OCT 01 2014

David J. Bracley, Clerk of Court

CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Beginning on an unknown date, but from at least in or about late 2010 and continuing to the present, in the Southern District of Texas and elsewhere, the defendants,

FNU LNU (First Name Unknown, Last Name Unknown)

a/k/a El Gordo,

a/k/a Mario Antonio Chavez-Melendez,

**a/k/a Hugo Alexander Melendez-Gonzalez,
a/k/a Jose Antonio Melendez,**

**JOSE WILLIAM QUINTANILLA,
a/k/a Pablo, a/k/a Ronko,**

**FRANCISCO GUERRA YVINNI PLEITEZ,
a/k/a Colochin, a/k/a Flaco,**

and

**ADELIO DE JESUS BATRES,
a/k/a Muneco,**

did knowingly combine, conspire, confederate and agree with each other and with other persons, known and unknown to the Grand Jury to:

A) recruit, entice, transport, provide, obtain and maintain by any means a person, and to benefit financially by receiving anything of value from participation in a venture which has recruited, enticed, harbored, transported provided, obtained and maintained a person, in and affecting interstate and foreign commerce, knowing and in reckless disregard of the fact that such person had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (a)(2).

B) recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, and to benefit financially by receiving anything of value from participation in a venture which has recruited, enticed harbored, transported,

provided, obtained, and maintained a person, in and affecting interstate and foreign commerce, knowing, and in reckless disregard of the fact that force, threats of force, fraud and coercion would be used to cause the person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (a)(2).

All in violation of Title 18, United States Code, Section 1594(c).

Manner and Means

1. The manner and means by which the conspirators sought to accomplish the objects of the conspiracy included, among others:

a) It was part of the conspiracy that FNU LNU (First Name Unknown, Last Name Unknown) (a/k/a Mario Antonio Chavez-Melendez; a/k/a Hugo Alexander Melendez-Gonzalez; a/k/a Jose Antonio Melendez) leased, controlled, participated in and operated an apartment/brothel at 505 Wells Fargo Drive, Apartment 2308, Houston, Texas.

b) It was further a part of the conspiracy that the conspirators would instruct the minor victims and young women how to solicit and charge for commercial sex acts for the purpose of prostitution and would collect fees for commercial sex acts.

c) It was further a part of the conspiracy that the conspirators would

provide undocumented alien women and girls for prostitution and some of these included minors under the age of 18.

Overt Acts

1. In or about late 2010, Delmy Lasenia Garcia-Hernandez, an illegal alien from Honduras, was sexually assaulted and beaten by JOSE WILLIAM QUINTANILLA, (a/k/a RONKO) who also threatened violence to Garcia's family and told her he would kill her child if she did not work for him as a prostitute.
2. In or about February 2013, A.L.T. who was a minor and an illegal alien from Mexico began to engage in commercial sex for FRANCISCO GUERRA YUVINNI PLEITEZ (a/k/a COLOCHIN; a/k/a FLACO) after he instructed her to charge \$40 for fifteen minutes of sex of which A.L.T. was to give \$20 to GUERRA.
3. In or about October 2013, M.G.C. who was a minor and an illegal alien from Mexico began to engage in commercial sex for FNU LNU (hereinafter EL GORDO) after he instructed her to charge \$40 for fifteen minutes of sex of which M.G.C. was to give \$20 to EL GORDO.
4. In or about October 2013, M.G.C. engaged in commercial sex for ADELIO DE JESUS BARTRES (a/k/a/ MUNECO) and she was to charge

\$40 for fifteen minutes of sex of which M.G.C. was to give \$20 to BARTRES.

5. Sometime in 2013, Ana Ludies Sanchez-Rodondo, an illegal alien from Honduras, worked as a prostitute for EL GORDO, FRANCISCO GUERRA YUVINNI PLEITEZ and ADELIO DE JESUS BARTRES.

6. During the time this conspiracy was ongoing, Mayra De Leon-Romero, an illegal alien from Guatemala, worked as a prostitute for JOSE WILLIAM QUINTANILLA (a/k/a RONKO; a/k/a PABLO), FRANCISCO GUERRA YUVINNI PLEITEZ (a/k/a COLOCHIN; a/k/a FLACO) and EL GORDO and once was forced by EL GORDO to engage in commercial sex after being threatened at gunpoint.

7. During the time this conspiracy was ongoing, Lourdes Taxis Salazar, an illegal alien from Mexico, worked as a prostitute for EL GORDO, JOSE WILLIAM QUINTANILLA (a/k/a RONKO; a/k/a PABLO), FRANCISCO GUERRA YUVINNI PLEITEZ (a/k/a COLOCHIN; a/k/a FLACO) and ADELIO DE JESUS BARTRES (a/k/a MUNECO).

8. On or about February 21, 2014, a confidential source (hereinafter CS) met with EL GORDO and discussed prostitution activities.

9. In or about February 2014 there are several consensual calls between

a CS and EL GORDO in which prostitution activities are discussed.

10. On or about March 6, 2014, a CS called FRANCISCO GUERRA YUVINNI PLEITEZ (a/k/a COLOCHIN; a/k/a FLACO) requesting a prostitute and he agreed to provide a girl for \$40 per fifteen minutes.

11. In or about July 2013, Nuvia Aguilar, an illegal alien from Honduras, worked as a prostitute for FRANCISCO GUERRA YUVINNI PLEITEZ (a/k/a COLOCHIN; a/k/a FLACO) and he told her he was going to show her what the clients would want to do and sexually assaulted her.

12. In March 2013, A.L.T. was transported by JOSE WILLIAM QUINTANILLA (a/k/a RONKO; a/k/a PABLO) for the purpose of engaging in commercial sex with approximately five partners.

All in violation of Title 18, United States Code, Section 1594(c).

COUNT TWO

In or about February 2013 until in or about May 2013 in the Southern District of Texas and elsewhere,

**JOSE WILLIAM QUINTANILLA,
a/k/a Pablo, a/k/a Ronko,**

**FRANCISCO GUERRA YVINNI PLEITEZ,
a/k/a Colochin, a/k/a Flaco,**

and

**FNU LNU (First Name Unknown, Last Name Unknown)
a/k/a El Gordo,
a/k/a Mario Antonio Chavez-Melendez,
a/k/a Hugo Alexander Melendez-Gonzalez,
a/k/a Jose Antonio Melendez,**

the defendants herein, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, a person, and benefit financially and receive anything of value from participation in a venture which recruited, enticed, harbored, transported, provided, obtained and maintained, in and affecting interstate and foreign commerce, a person, that is, A.L.T., having had a reasonable opportunity to observe A.L.T., and knowing, and in reckless disregard of the fact that A.L.T. had not attained the age of 18 years and would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), and (b)(2).

COUNT THREE

In or about March 2013 in the Southern District of Texas and elsewhere,

**FRANCISCO GUERRA YVINNI PLEITEZ,
a/k/a Colochin, a/k/a Flaco,**

**ADELIO DE JESUS BATRES,
a/k/a Muneco,**

and

**JOSE WILLIAM QUINTANILLA,
a/k/a Pablo, a/k/a Ronko,**

the defendants herein, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, a person, and benefit financially and receive anything of value from participation in a venture which recruited, enticed, harbored, transported, provided, obtained and maintained, in and affecting interstate and foreign commerce, a person, that is, M.G.C., having had a reasonable opportunity to observe M.G.C., and knowing, and in reckless disregard of the fact that M.G.C. had not attained the age of 18 years and would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), and (b)(2).

COUNT FOUR

A. INTRODUCTION

The allegations as set forth in Count One are realleged and incorporated herein.

B. THE CONSPIRACY

Beginning on an unknown date, but from at least in or about late 2010 and continuing to the present, in the Southern District of Texas and elsewhere, the defendants,

FNU LNU (First Name Unknown, Last Name Unknown)

a/k/a El Gordo,

a/k/a Mario Antonio Chavez-Melendez,

a/k/a Hugo Alexander Melendez-Gonzalez,

a/k/a Jose Antonio Melendez,

JOSE WILLIAM QUINTANILLA,

a/k/a Pablo, a/k/a Ronko,

FRANCISCO GUERRA YVINNI PLEITEZ,

a/k/a Colochin, a/k/a Flaco,

and

ADELIO DE JESUS BATRES,

a/k/a Muneco,

the defendants herein, did knowingly and willfully conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, to commit offenses against the United States, that is:

- 1) to transport aliens within the United States, in any manner whatsoever, for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that such aliens had entered the United States in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

- 2) to conceal, harbor, and shield from detection, and to attempt to conceal, harbor, and shield from detection, aliens, knowing and in reckless disregard of the fact that the aliens had come to, entered, and remained in the United States in violation of law, contrary to Title 8, United States Code, Section 1324(a)(1)(A)(iii).

Overt Acts

In furtherance of the conspiracy described herein, one or more of the co-conspirators committed, in the Southern District of Texas and elsewhere, one or more of the following overt acts:

1. Beginning in or about 2010, JOSE WILLIAM QUINTANILLA (a/k/a RONKO; a/k/a PABLO), and FRANCISCO GUERRA YUVINNI PLEITEZ (a/k/a COLOCHIN; a/k/a FLACO) transported Delmy Lasenia Garcia Hernandez to various clients for the purpose of commercial sex by means of a vehicle.
2. Beginning in or about February 2013, FRANCISCO GUERRA YUVINNI PLEITEZ (a/k/a COLOCHIN; a/k/a FLACO), FNU LNU (First Name Unknown, Last Name Unknown) (a/k/a Mario Antonio Chavez-Melendez; a/k/a Hugo Alexander Melendez-Gonzalez; a/k/a Jose Antonio Melendez) and JOSE WILLIAM QUINTANILLA (a/k/a RONKO; a/k/a PABLO) transported A.L.T. to various clients for the purpose of commercial sex by means of a vehicle.

3. Beginning in or about February 2013, FRANCISCO GUERRA YUVINNI PLEITEZ (a/k/a COLOCHIN; a/k/a FLACO) and FNU LNU (First Name Unknown, Last Name Unknown) (a/k/a MARIO ANTONIO CHAVEZ-MELENDEZ; a/k/a HUGO ALEXANDER MELENDEZ-GONZALEZ; a/k/a JOSE ANTONIO MELENDEZ) and ADELIO DE JESUS BARTRES (a/k/a/ MUNECO) transported M.G.C. to various clients for the purpose of commercial sex by means of a vehicle.

4. In or about, Mayra De Leon-Romero was harbored by FNU LNU (First Name Unknown, Last Name Unknown) (a/k/a MARIO ANTONIO CHAVEZ-MELENDEZ; a/k/a HUGO ALEXANDER MELENDEZ-GONZALEZ; a/k/a JOSE ANTONIO MELENDEZ) and FRANCISCO GUERRA YUVINNI PLEITEZ (a/k/a COLOCHIN; a/k/a FLACO) at various locations in Houston, Texas.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I),
1324(a)(1)(A)(ii), 1324(a)(1)(A)(iii).

A TRUE BILL

ORIGINAL SIGNATURE ON FILE

A MEMBER OF THE GRAND JURY

KENNETH MAGIDSON
UNITED STATES ATTORNEY

By:

A handwritten signature in black ink, appearing to read "Douglas Davis", is written over a horizontal line.

DOUGLAS DAVIS
ASSISTANT UNITED STATES ATTORNEY